

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CYPRESS HOLDINGS, III, L.P., individually
and derivatively on behalf of SPORT-BLX,
INC.,

Plaintiff,

v.

GEORGE HALL, JOSEPH DE PERIO,
DANIEL STRAUSS, FRANCIS
RUCHALSKI, CESAR BAEZ,
CHRISTOPHER JOHNSON, SPORT-BLX,
INC., SPORT-BLX SECURITIES, INC.,
CLINTON GROUP INC., and
GLASSBRIDGE ENTERPRISES, INC.,

Defendants.

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Civil Action No. 1:22-cv-1243-LGS

related case:

Civil Action No. 1:22-cv-8111-LGS

NOTICE OF MOTION

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PLEASE TAKE NOTICE that upon the Declaration of Wylie M. Stecklow, dated November 22, 2024, and exhibits annexed thereto; the accompanying Memorandum of Law, November 22, 2024; the accompanying Supplemental Brief of Defendants GlassBridge Enterprises, Inc., Daniel Strauss and Francis Ruchalski; Defendants' Statement of Undisputed Facts pursuant to Local Rule 56.1; and all pleadings and proceedings previously had herein, Defendants Sport-BLX, Inc. ("Sport-BLX"), Sport-BLX Securities, Inc. ("Sport-BLX Securities"), Clinton Group, Inc. ("Clinton Group"), George Hall, Cesar Baez, Joseph De Perio, and Christopher Johnson (together the "Sport-BLX Parties"), Defendants GlassBridge Enterprises, Inc., Daniel Strauss and Francis Ruchalski, Defendants in this Action, and Plaintiff Sport-BLX, Inc. in related case Civil Action No. 1:22-cv-8111, will move before the Honorable Lorna G. Schofield, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York at a date and time to be determined by the Court, for an Order pursuant to

Rule 56 of the Federal Rules of Civil Procedure: (i) holding Michael M. Salerno and Cypress Holdings III, L.P. ("Cypress,") defendants in related case No. 1:22-cv-8111, liable on all claims asserted therein, and (ii) dismissal of all claims asserted by Cypress in this Action No. 1:22-cv-1243.

Dated: New York, New York
November 22, 2024

WYLIE STECKLOW PLLC

A handwritten signature in black ink, appearing to read 'Wylie Stecklow', is written over a horizontal line.

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